

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

Caption in Compliance with D.N.J. LBR 9004-1(b)

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| <p>In re:</p> <p>LTL MANAGEMENT LLC,</p> <p style="text-align: center;">Debtor.</p> | <p>Chapter 11</p> <p>Case No.: 21-30589 (MBK)</p> <p>Honorable Michael B. Kaplan</p> |

**NOTICE OF MOTION OF OFFICIAL COMMITTEE OF TALC CLAIMANTS II FOR
MODIFICATION OF THE COURT’S ORDER REGARDING: (A) DEBTOR’S MOTION FOR
AN ORDER DETERMINING THAT THE UNITED STATES TRUSTEE’S NOTICE OF
“RECONSTITUTED AND AMENDED” TALC CLAIMANTS COMMITTEE IS INVALID AND
REINSTATING THAT COMMITTEE; AND (B) MOTION FOR ORDER VACATING
APPOINTMENT OF SECOND OFFICIAL COMMITTEE OF TALC CLAIMANTS AND
ADDITION OF NEW COMMITTEE MEMBERS FILED BY ARNOLD & ITKIN LLP [DOCKET
NO. 1273], TO AUTHORIZE TCC II TO CONTINUE TO EXIST FOR PURPOSES OF
PURSUING APPEALS OF THE MOTION TO DISMISS AND PRELIMINARY INJUNCTION
ORDERS**

PLEASE TAKE NOTICE that the Official Committee of Talc Claimants II (“TCC II”), by and through its proposed undersigned local counsel, shall move before the Honorable Michael B. Kaplan, U.S.B.J., Chief, on **March 30, 2022 at 10:00 a.m.**, or as soon as counsel may be heard, at the U.S. Bankruptcy Court, District of New Jersey, 402 East State Street, Trenton, NJ 08608, for entry of an order modifying the Court’s *Order Regarding: (A) Debtor’s Motion For An Order Determining That The United States Trustee’s Notice Of “Reconstituted And Amended” Talc Claimants Committee Is Invalid And Reinstating That Committee; And (B) Motion For Order Vacating Appointment Of Second Official Committee Of Talc Claimants And Addition Of New Committee Members Filed By Arnold & Itkin LLP* [Docket No. 1273], to authorize TCC II to continue to exist for purposes of prosecuting and participating in appeals of the Motion to Dismiss and Preliminary Injunction Orders (the “Motion”).

PLEASE TAKE FURTHER NOTICE that opposition to the relief requested and/or cross-motions, if any, shall be filed with the Clerk of the Bankruptcy Court and served upon all parties in interest at least seven (7) days before the hearing date of the Motion in accordance with D.N.J. LBR 9013-2(a).

PLEASE TAKE FURTHER NOTICE that unless objections are timely filed, the Motion shall be decided on the papers in accordance with D.N.J. LBR 9013-3(d), and the relief requested may be granted without further notice or hearing.

PLEASE TAKE FURTHER NOTICE that pursuant to D.N.J. LBR 9013-3(a), in the event the Motion is contested, there is a duty to confer to determine whether a consent order may be entered disposing of the Motion or to stipulate to the resolution of as many issues as possible.

PLEASE TAKE FURTHER NOTICE that in accordance with D.N.J. LBR 9013-3(e), unless the Court authorizes otherwise prior to the hearing date hereof, no testimony shall be taken at the hearing except by certification or affidavit.

Date: March 7, 2022

Respectfully submitted,

**SHERMAN, SILVERSTEIN,
KOHL, ROSE & PODOLSKY, P.A.**

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